

PSJ3

Exhibit 678

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF OHIO
3 EASTERN DIVISION

4

5

6 *****

7 IN RE:

8 NATIONAL PRESCRIPTION OPIATE MDL NO. 2804

LITIGATION

9

 This document relates to: Case No. 17-MD-2804

10

 All cases Hon. Dan A. Polster

11 *****

12 HIGHLY CONFIDENTIAL - SUBJECT
13 TO FURTHER CONFIDENTIALITY REVIEW

14 VIDEOTAPED DEPOSITION OF:

15 RONALD LINK

16 MOTLEY RICE

17 55 Cedar Street

18 Providence, Rhode Island

19 December 11, 2018 9:09 a.m.

20

21

22 Darlene M. Coppola

23 Registered Merit Reporter

24 Certified Realtime Reporter

1 Q. It states, "SOM process will include
2 store controlled substances, orders placed
3 with CVS warehouses and outside vendors,
4 Cardinal and McKesson," correct?

5 A. Correct.

6 Q. So we know from looking at this,
7 July 8, 2013, that prospectively at least, the
8 plan was at that time to include outside
9 vendors, correct?

10 A. Correct.

11 Q. And up until that time, outside vendor
12 purchases by CVS pharmacies were not being
13 monitored by CVS; is that correct?

14 A. Again, I was not -- I'm not aware --
15 I'm not aware that it wasn't.

16 Q. At least according to the document,
17 that's what it indicates; is that right?

18 A. Correct.

19 Q. And these are the same stores that
20 were purchasing narcotics that were for sale
21 retail to the United States public; is that
22 correct?

23 A. Correct.

24 Q. And those included class 3 narcotics;

1 is that right?

2 A. Correct.

3 Q. And those also included class 2

4 narcotics, correct?

5 A. Correct.

6 Q. So who, if anybody, was monitoring

7 those purchases by CVS pharmacies and sales to

8 the general public, to your knowledge, if

9 anybody?

10 A. I'm not aware of who would be

11 monitoring that.

12 Q. So let's proceed to document 19B.

13

14 (Exhibit No. 19B marked for

15 identification.)

16

17 BY MR. BAKER:

18 Q. This is an e-mail dated 8/22/14, from

19 Pamela Hinkle to a series of people within

20 CVS.

21 Do you see that?

22 A. I do.

23 Q. All right. You see there where she

24 says that -- it says, "So we will be out of

1 Q. And so you really have no idea during
2 the period of time that you were in charge of
3 the suspicious order monitoring program and
4 logistics just the extent to which these
5 outside vendors were providing narcotics to
6 CVS pharmacies; is that correct?

7 A. That is correct.

8 MR. BAKER: Let me show you
9 Exhibit 51.

10
11 (Exhibit No. 51 marked for
12 identification.)

13
14 BY MR. BAKER:

15 Q. Exhibit 51 is two pages. The first
16 page is Bates 30892. The second page is Bates
17 30995.

18 Do you see that?

19 A. I do.

20 Q. Okay. This is a wholesale supply
21 agreement between CVS and Cardinal -- the
22 first page, or the first page of a wholesale
23 supply agreement between CVS and Cardinal
24 dated January 1, 2004, correct?